

TABLE OF CONTENTS

DISCLAIMER	ii
1. INTRODUCTION	1-1
SCREENING CHECKLIST	1-3
2. WASTE MANAGEMENT	2-1
WASTE MANAGEMENT	2-3
USED OIL	2-4
USED OIL FILTERS	2-5
USED ANTIFREEZE	2-6
USED SOLVENTS	2-8
BATTERIES	2-9
RAGS	2-10
TIRES	2-10
ABSORBENTS	2-11
3. WASTEWATER MANAGEMENT	3-1
FLOOR DRAINS AND WASTEWATER MANAGEMENT	3-1
STORM WATER	3-4
4. AIR POLLUTION CONTROL	4-1
PARTS CLEANERS	4-1
MOTOR VEHICLE AIR CONDITIONERS	4-3
CATALYTIC CONVERTERS	4-5
FUELS	4-7
PAINTS AND THINNERS	4-9
5. UST/SPCC/EMERGENCY SPILL PROCEDURES	5-1
UNDERGROUND STORAGE TANKS	5-1
SPILL PREVENTION AND EMERGENCY RESPONSE	5-4

DISCLAIMER

This project has been funded, at least in part, with Federal funds from the U.S. Environmental Protection Agency (EPA) Office of Enforcement and Compliance Assurance under contract to SAIC, Contract Nos. 68-C4-0072, WA Nos. EC-2-2 (OC) and EC-2-3 (OC). The mention of trade names, commercial products, or organizations does not imply endorsement by the U.S. Government.

1. INTRODUCTION

The United States Environmental Protection Agency (EPA) is providing this guidebook and screening checklist as a public service to the automotive service and repair industry. The Office of Compliance, through various meetings with industry representatives, shop owners and technicians, found that the main issue for automotive service and repair shops not in compliance with applicable environmental regulations was the lack of information available to the shop owner. This guidebook highlights for the user the various federal environmental programs a shop owner may be subject to, depending upon the activities that occur at the shop.

The information is correct and accurate, as of the date published. The guidebook and associated screening checklist highlights important or key environmental program requirements as they apply to the various federal environmental programs. **The checklist does not provide the complete environmental requirements necessary for a shop to be in total compliance.** State and local laws, requirements, and rules, may apply in lieu of, or in addition to, the federal rules. Remember, this guidebook and screening checklist is a beginning, it is NOT the final word on environmental compliance. By understanding the basics of each environmental program, the user can then seek appropriate assistance from various state and local agencies.

Company names, products, and processes identified in this guidebook are only used as sources of reference. These names are familiar and/or prototypical within the automotive service and auto body repair industry. They are intended to help the user better understand the checklist, its implications, and his environmental responsibilities.

The use of corporate and/or organizational names by the EPA should NOT be construed as an official endorsement of the named companies, services, products, or processes. It is up to you, the shop owner or facility manager, to make the best business decision in order to achieve and maintain compliance with environmental requirements based upon your business environment and shop operation.

If you are not sure about your state and/or local environmental requirements, please contact your state and local environmental office. These offices can be found in the Blue Pages of your local telephone directory. If you don't know who to contact, you might consider the CCAR-GreenLink® Compliance Assistance Center.

CCAR-GreenLink® is a partnership between the EPA and the Coordinating Committee for Automotive Repair (CCAR). CCAR is an automotive industry organization whose mission is to augment the professionalism of automotive technicians.

There are five ways to reach CCAR-GreenLink®:

Toll-free: 1-888-GRN-LINK (476-5465)

Internet: <http://www.ccar-greenlink.org>

E-Mail: ccarinfo@unicom.net

Phone: 1-913-498-2227

Fax: 1-913-498-1770

2. WASTE MANAGEMENT

The Resource Conservation and Recovery Act (RCRA) defines a *solid waste* as any solid, liquid, or gas that is discarded, abandoned, recycled, reclaimed, burned, burned for energy recovery, or used in a manner constituting disposal. In order to be considered a *hazardous waste*, materials must first be considered as *solid waste*. Even if a material is really dirty (such as solvent being used in a parts cleaner), the material only becomes a RCRA hazardous waste once it first meets the definition of a *solid waste*.

Hazardous wastes are solid wastes that contain any of a number of listed waste materials (usually hazardous chemicals) contained in the Code of Federal Regulations.

Listed wastes may be found in some spent cleaning solvents. These include:

- Spent halogenated solvents that contain chlorinated compounds
- Spent nonhalogenated solvents that contain xylene, methanol, ethyl ether or methyl isobutyl ketone.

Wastes can also be classified as hazardous if they exhibit one of the following characteristics:

- Ignitability (flashpoint <140°F)
 - Solvents, gasoline
- Toxicity (fails a TCLP test—an expensive test that most shops will not use because to test one drum can be more expensive than simply disposing of the drum as hazardous waste)
 - Gasolines, solvents, possibly used oil and antifreeze
- Corrosivity (pH less than 2 or greater than 12.5)
 - Battery acid, caustic paint strippers, some floor cleaners (facilities that use alkaline or lime-based cleaners may produce corrosive wastes)
- Reactivity
 - Wastes that are normally unstable or wastes that react violently or create toxic gases when mixed with water. These wastes will not typically be found at auto repair

shops.

Table 1.
Typical Wastes Generated at Auto Repair Shops and Typical Category
(Hazardous or Nonhazardous) by Disposal Method.

Waste Stream	Typical Category If Not Mixed With Other Hazardous Waste	If Disposed in Landfill and Not Mixed With a Hazardous Waste	If Recycled
Used Oil	Used Oil	Hazardous Waste	Used Oil
Used Oil Filters	Nonhazardous Solid Waste, if Completely Drained	Nonhazardous Solid Waste, if Completely Drained	Used Oil, If Not Drained
Used Transmission Fluid	Used Oil	Hazardous Waste	Used Oil
Used Brake Fluid	Used Oil	Hazardous Waste	Used Oil
Used Antifreeze	Depends on Characterization	Depends on Characterization	Depends on Characterization
Used Solvents	Hazardous Waste	Hazardous Waste	Hazardous Waste
Used Citric Solvents	Nonhazardous Solid Waste	Nonhazardous Solid Waste	Nonhazardous Solid Waste
Lead Acid Automotive Batteries	Not a Solid Waste If Returned to Supplier	Hazardous Waste	Hazardous Waste
Shop Rags Used for Oil	Used Oil	Depends on Used Oil Characterization	Used Oil
Shop Rags Used for Solvent or Gasoline Spills	Hazardous Waste	Hazardous Waste	Hazardous Waste
Oil Spill Absorbent Material	Used Oil	Depends on Used Oil Characterization	Used Oil
Spill Material for Solvent and Gasoline	Hazardous Waste	Hazardous Waste	Hazardous Waste
Catalytic Converters	Not a Solid Waste if Returned to Supplier	Nonhazardous Solid Waste	Nonhazardous Solid Waste
Spilled or Unused Fuels	Hazardous Waste	Hazardous Waste	Hazardous Waste
Spilled or Unusable Paints and Thinners	Hazardous Waste	Hazardous Waste	Hazardous Waste
Used Tires	Nonhazardous Solid Waste	Nonhazardous Solid Waste	Nonhazardous Solid Waste

WASTE MANAGEMENT

Has the facility determined which wastes are hazardous wastes?

Yes—Facility has gone through a process known as waste determination and can say, “used oil is not hazardous waste because we recycle all of it and don’t mix any hazardous chemicals with it,” or “solvent is hazardous waste because it is flammable.”

No—Facility has not gone through the waste determination process.

Does facility generate more than 100 kg. (220 lbs.) of hazardous waste per month?

Generation occurs when a substance becomes a waste. Thus, solvent stored in a drum waiting for disposal or recycling is considered “generated,” while solvent in a parts cleaner is not yet a waste and has not yet been generated. When determining the volumes of waste generated, only waste in a container waiting for disposal would be considered “generated.” This total includes only hazardous waste as defined by RCRA and determined to be hazardous waste by the facility. It does not include wastes that are simply nasty, such as used oil that has not been mixed with anything and is destined for recycling.

Yes—Each month facility generates approximately one-half of a 55 gallon drum of hazardous waste or more as identified in the first question. (A 55 gallon drum of hazardous waste weighs approximately 440 lbs or 200 kg. Thus one-half of a drum would be 100 kg or 220 lbs.)

No—Facility generates less than one-half of a 55 gallon drum of hazardous waste each month.

If yes, does facility have a U.S. EPA hazardous waste generator I.D. number?

Yes—Facility has obtained an 8-digit number from EPA or the State. This number can be found on all waste shipping forms. It is usually found near the top of the form under the heading, “Facility ID #.” If the number is from the State, the number will start with the State abbreviation followed by a letter to designate the type of company and then the 8-digit number. e.g., NYD-12345678.

No—Facility has not obtained an EPA identification number.

USED OIL

Are used oil containers and piping leak free, segregated, and labeled “used oil?”

Yes—Used oil is *leak free*, *segregated* from other wastes in its own container, and is *labeled* with the words “used oil.”

- **Leak free**—No leaks are observed.
- **Segregated**—Containers are properly segregated if wastes are not mixed. For example, used oil is in a separate container from antifreeze, solvent is in its own container, oil spill absorbent is separated from regular trash.
- **Labeled**—Tanks, drums, or buckets storing used oil for disposal are labeled with the words “used oil.” To receive a “yes,” the exact words “used oil” are necessary. No special labels are necessary, provided the words “used oil” are visible. Spray painted, crayoned, or hand written labels are ok.

If the tanks, drums, or pipes are color coded (e.g., oil tanks are green, solvent tanks are red), labeled “waste oil,” or something similar that lets you know that the container contains used oil, the facility is on the right track, but the words “used oil” are required by EPA because “used oil” that is destined for recycling has less strict management standards than waste oil, oils that have been mixed with hazardous waste, or oil that is not destined for recycling.

- **Used oil piping**—Some facilities have pipes that connect the used oil storage tank outside the building to a disposal point inside the building. This way, technicians can pour their oil in a funnel or small bucket which is attached to the piping and the oil goes directly to the tank. If this is the case, the funnel/bucket or piping should be labeled with the words “used oil” to receive a “yes.”

No—Leaks are observed, *or* used oil is not segregated, *or* either piping or the tank is not properly labeled.

Are hazardous waste fluids mixed with used oil?

Yes—Used solvent, gasoline, or other hazardous substances are mixed with used oil. Though mixing solvents, gasoline is acceptable, the shop is setting itself up for closer scrutiny by the inspector. Too much mixing can cause used oil to become waste oil. If at all possible, keep solvents and gasoline separate from used oil.

No—Only used oil, transmission fluid, or brake fluid are stored in the same container/tank.

Is used oil collected and sent offsite for recycling or burned in an onsite heater?

Recycle—Facility has a regular hauler who takes the oil to a recycling facility.

Onsite heater—Facility burns its used oil in an onsite heater used to heat the facility.

Burned offsite—Facility has a hauler or takes its own oil to a used oil burner.

Other—Facility will raise an issue with the inspector that will cause further investigation.

Does the facility accept household used oil?

Yes—Facility accepts oil from do it yourselfers.

No—Facility does not accept any oil not changed at the shop.

If yes, is it tested for hazardous waste (solvent/gasoline) contamination?

Yes—Facility has the customer sign a form stating that the substance contains only used oil and checks the oil in one of the following ways:

- Visually inspects the oil for signs of antifreeze, solvent, or other substance that does not appear to be oil.
- Uses a “sniffer,” a hand held detector that the facility places near the substance and indicates whether total halogens are higher than normal for used oil.

No—Facility does not test the used oil using one of the above methods nor does it ask the do-it-yourselfer to sign a form stating that the substance is only used oil.

USED OIL FILTERS

Are used oil filters completely drained before disposal?

Yes—Facility completely drains filters in an oil pan or bucket, and makes sure they are empty before putting the filters in the trash or recycling bin. Filters must be drained using one of the following *hot draining* methods approved by EPA:

- Puncturing the filter anti-drain back valve or filter dome end and hot-draining for at least 12 hours, or
- Hot-draining and crushing, or

- Dismantling and hot-draining, or
- Any other equivalent hot-draining method which will remove all the used oil in the filter.

No—The facility does not use any of the above methods to drain oil filters.

How are used oil filters disposed?

Scrap metal—Filters are recycled.

Service—Facility contracts with a service (e.g., SafetyKleen) which takes filters.

Trash—Filters are disposed in the dumpster (not segregated from other waste such as paper, plastics, food, etc.)

Other—Method of disposal is not listed.

USED ANTIFREEZE

Is used antifreeze properly contained, segregated, and labeled?

Yes—All three of the following criteria are met:

- *Labeled*—Labels or color coating indicate that the container contains only antifreeze. In contrast to used oil, there are no set labels for antifreeze. To be considered properly labeled, the drum/container/tank should simply have the words “used antifreeze” or “waste antifreeze, or “antifreeze only”, or something similar that distinguishes antifreeze storage from oil and solvent storage. Words can be spray painted, stenciled, crayoned, or more formally labeled.
- *Segregated*—Used antifreeze is in its own container and not mixed with other liquids.
- *Contained*—Containers are closed (lids are on and caps are screwed on tight, except when actually adding or removing liquid).

No—Any of the above are not done.

Does the facility generate any antifreeze that is a hazardous waste (> 5 ppm lead)?

A facility generates hazardous antifreeze if it has characterized antifreeze as hazardous waste. Antifreeze would

be considered hazardous if it is mixed with a hazardous waste such as solvent or gasoline. Antifreeze could also be hazardous if it comes from an old car where the antifreeze has been sitting for years and has picked up enough metals to be characterized as hazardous for metals content, or if the pH > 12.5.

Yes—Facility mixes hazardous solvent or gasoline with waste antifreeze, has tested its antifreeze and determined it is hazardous, or knows from process knowledge (e.g., it only works on old beat up cars that may leave lead or other metals in antifreeze) that its antifreeze is hazardous.

No—Facility has determined its antifreeze is not hazardous by testing the antifreeze or process knowledge (facility understands the potentially hazardous constituents in antifreeze and has determined that the antifreeze it generates is not hazardous, or has explained its process to the state EPA and have been told that their antifreeze is not a hazardous waste).

Do not know—Facility has not made a determination whether its used antifreeze is a hazardous waste, but simply manages it as it believes is the right way to do so.

If yes, is it recycled onsite in a closed loop system?

Yes—Antifreeze is recycled by a recycling machine that connects directly to the car's radiator, recycles the antifreeze, and puts it right back into the same car that it came from. A similar system that connects to used antifreeze storage drums is not considered a closed loop system.

No—Used antifreeze is not recycled in a closed loop system.

If no, is it counted toward facility generator status?

This question is just a reminder from the 2nd question on the checklist that any antifreeze that is a hazardous waste needs to be considered as part of the 100 kg/220 pounds per month limit for Conditionally Exempt Small Quantity Generators.

Yes—Hazardous waste antifreeze that is not recycled in a closed loop system is included in the total from question 2 of the checklist.

No—Hazardous waste antifreeze is not included.

If used antifreeze is not recycled onsite, how is it disposed?

Recycled offsite—The antifreeze is recycled offsite and the facility has the EPA identification number of the recycler (should be on shipping papers.)

Mixed with other fluids—Antifreeze is mixed with used oil, solvents, or other fluid.

Landfill—Antifreeze is disposed at the landfill. Many landfills have a tank designated for used antifreeze. For this question, “landfill” does not include antifreeze that is dumped in the trash.

Other—Method of disposal is not listed.

USED SOLVENTS

Are used solvents stored in proper containers and properly labeled?

This section refers only to “used solvents,” or those that have been “generated” as waste.

Yes—Solvents are properly contained *and* labeled as described below:

- **Contained**—Containers are compatible with the substance they are storing and have no signs of leaks or significant damage due to major dents or rust. Containers are also closed (lids are on, caps are screwed on tight) except when actually adding or removing liquid.
- **Labeled**—Hazardous solvents destined for disposal must be labeled so as to identify the contents of the container. For hazardous used solvents, the container must be labeled “used solvents,” or show the chemical name of the solvent. Solvents that are being used in a parts washer are not required to be labeled.

No—Solvents are not properly contained or are not properly labeled.

N/A—No solvents used at the facility.

How are used solvents disposed?

Service—Facility contracts with SafetyKleen or another company to take used solvent on a *previously scheduled basis, as identified in a contract*.

Mixed with other fluids—Solvents are mixed with another liquid such as used oil or wash water, ultimately being disposed in the same manner that the liquid with which they are being mixed is disposed.

Other—Method of disposal is not listed.

Does facility have hazardous waste manifests or shipping papers on file?

Yes—Facility has the shipping papers/manifests for solvent wastes disposed over the last year.

No—Facility does not have shipping papers/manifests for hazardous solvent wastes on file.

N/A—Facility generates no solvents that are hazardous (e.g., only uses citris or other aqueous solvent).

BATTERIES

Does facility return used batteries to new battery supplier?

Yes—Supplier takes back used batteries for each one purchased.

No—Disposed in other way.

N/A—Facility does not change batteries.

If not, how are used automotive batteries disposed?

Recycle—Batteries are sent to a recycling facility.

Hazardous waste landfill—Facility can name the place where batteries go and has records of the amount sent.

Other—Method of disposal is not listed.

Are used batteries contained and covered prior to disposal?

Yes—(1) Batteries are stored inside or outside under a tarp or roof; and (2) Batteries are stored in a pan, or other device, so that any leakage can not enter floor drains on the outside. Items stored inside would not be considered “contained” if a spill or leak (battery acid) would be discharged to a drain.

No—Either 1 or 2 are not done.

RAGS

How are used rags and towels disposed?

Laundry service—Rags are sent offsite to be laundered (often with technician uniforms.)

Burned for heat—Rags are mixed with used oil or other fluids and burned in the shop furnace. This does not include burning in a barrel simply for disposal.

Trash—Rags are disposed with trash (in a dumpster) and not segregated.

How are used rags stored while onsite?

Separate container—In a container (bucket, can, barrel, on a shelf or bench, etc.) that only contains rags.

Shop trash can—Can/dumpster that contains all shop waste (not segregated).

Floor—On the floor, in a pile or simply scattered.

TIRES

How are used tires disposed?

Resale—Tires are resold.

Retreading—Tires are retreaded or some other *specific* method of recycling is used. This may include state or local programs that shred tires and then use them for asphalt.

Landfill—Tires are sent to the landfill.

Customer—Used tires are given back to the customer.

N/A—Facility does not change tires.

Other—Method of disposal is not listed.

ABSORBENTS

Does facility use sawdust or other absorbents for spills or leaks?

Absorbents are generally kitty litter type substances, known as “quick dry,” “speedi dry,” “oil dry,” etc. Sawdust is sometimes used as an absorbent.

Yes—Facility uses one or more of the above substances.

No—Facility does not use any of the above substances.

Does facility determine whether used absorbents are considered hazardous waste before disposal?

Absorbents are considered a hazardous waste if:

- They are contaminated with a hazardous material such as solvent or gasoline, or
- They are characterized as hazardous by the facility owner.

As indicated in Table 1, although used oil is not considered a hazardous waste if it is recycled, it could be considered waste if it is disposed in a landfill. Thus, anything that absorbs used oil and is thrown in the trash could be considered a hazardous waste, even if it is not mixed with a hazardous waste.

Keeping this in mind, note that this question is only asking whether absorbents are included in the waste determination process for Question 1 of Waste Management.

Yes—Facility characterizes its absorbents, *or* uses absorbents only for oil that is to be recycled.

No—Facility does not characterize absorbents *and* uses absorbents for oil or other materials not destined to be recycled.

How are absorbents used for oil spills disposed?

This question refers only to the disposal of absorbents used to absorb *oil* spills.

N/A—Absorbents are not used.

Burned for energy—Absorbents are burned for onsite heat.

Disposed as hazardous waste—Absorbents are separately drummed, labeled as “Hazardous Waste,” and disposed by a hazardous waste hauler.

Characterized as nonhazardous and landfilled—Facility has determined that the absorbents are a nonhazardous solid waste and disposes of them with regular trash.

3. WASTEWATER MANAGEMENT

FLOOR DRAINS AND WASTEWATER MANAGEMENT

How does facility clean shop floor and surrounding area?

Uses Dry Cleanup—Facility uses “dry methods” such as dry mop, broom, rags, etc., thus reducing generation of contaminated water.

Uses Water—Facility uses a hose or wet mop, thus generating wastewater.

Suggested Dry Clean-Up Methods

Small Spills

Use shop towels which are sent to an industrial laundry. Avoid paper towels! If paper towels are used to pick up hazardous waste, they become a Hazardous Waste.

Medium Spills

Use absorbent snakes or portable berms as temporary holding areas to contain a liquid while you clean it up. “Squeeze” up the liquid into a dust pan and drain the pan into the appropriate container. Then wipe with a shop towel.

Oil and Water/Antifreeze Spills

1. Use a hydrophobic mop for cleaning up spills containing oil and recycle the recovered oil in a mop bucket labeled “waste oil”.
2. Use a regular mop for cleaning up antifreeze and recycle the recovered antifreeze in a mop bucket labeled “waste antifreeze”.
3. If there is a slight film on the ground after steps 1 and 2, use a shop towel to clean it up. Use an industrial laundry to clean shop towels.
4. Lastly, if there is something still on the floor, clean it up with soap and water.

Are fluids (oil, antifreeze, solvent) allowed to enter floor drains for disposal?

Yes—Facility has not taken precautions to prevent fluids from entering the drains.

No—Facility has taken precautions to prevent fluids (oil, antifreeze, solvent, other spills) from entering the floor drain. Such precautions could include covering the shop drains or providing some type of barrier that would prevent an accidental spill from entering drains except during wash downs. If facility can identify procedures that it takes to prevent spills from entering the drains, answer “no.”

No floor drains on site—Facility does not have floor drains.

A Note on Biodegradable Soap

Some facilities wash their floors or outside areas with biodegradable soap. They may tell a story of the first time they used the soap, someone called EPA or the fire department to report them for discharging antifreeze, and that when the fire department came, the facility showed them that the substance was not antifreeze, but biodegradable soap, and that every thing was ok.

Biodegradable soap is better for the environment than nondegradable soap and solvents. However, it still may have an impact on the environment, depending on how biodegradable it is, and what bacteria in the environment actually does the degrading. For example, plants are degradable, also, but too many plants in a creek leads to excessive plant-eating bacteria growth. The bacteria use oxygen, which leads to less oxygen for the fish, and consequently dead fish. Facilities that use biodegradable soap should limit the use of water with the soap and dispose of the soapy water mixture in the sanitary sewer, rather than the storm sewer. If there is no sanitary sewer system, the soapy water mixture should be dumped in a grassy or planted area (or disposed in a septic tank) where it will not directly run off to the storm system and consequently flow unfiltered to streams and rivers.

How are fluids disposed?

Fluids refers to water mixed with any of the fluids identified in the previous question.

Municipal sanitary sewer—The same place household water/toilet water goes. This water is treated by a treatment plant before it goes to a stream or river.

Storm sewer—A direct link to rivers and streams. Although all facilities should only have these sewers outside the shop, some may have direct connections from the inside drains to storm sewers. This water generally does not receive any treatment prior to discharging to a stream or river.

Street—Street includes driveways, parking lots, or other paved areas adjacent to the shop. Some shops will wash down the inside of the shop and dump the water on the paved area in front of the shop. Dumping water (or anything else) in this manner would be equivalent to dumping it directly in a storm

sewer because that is where the paved areas drain.

Other—Method of disposal is not listed.

NPDES

National Pollutant Discharge Elimination System. This is the National Clean Water Act compliance program regulating discharges to navigable waters. Auto shops usually do not have this permit. Due to their size, they are likely to be discharging any wash waters to a sanitary sewer system not to a pipe which goes to a stream or river. However, if they discharge directly to a stream or river, this permit is required.

If floor drains discharge to municipal sanitary sewer, to storm sewer, or the street, has facility notified POTW about potential contamination in washwater?

Publicly Owned Treatment Works (POTWs) are where the municipal sanitary sewer drains, and where sanitary sewer discharges are treated prior to entering streams and rivers. They may also be referred to as municipal Wastewater Treatment Plants (WWTPs). Municipal WWTPs may implement a pretreatment program and regulate discharges to the sanitary sewer through prohibitions on certain discharges, discharge limits, and discharge permits. Facilities should contact the WWTP to see if any pretreatment requirements apply to them. The facility could be liable if it discharges a significant amount of oil, or other material, and those discharges cause problems at the POTW or cause it to violate its NPDES permit.

Storm drains are usually located outside the shop, in the parking lot or street. The storm sewer is designed to carry only uncontaminated rainwater to the nearest stream, river, or lake.

Yes—Facility has contacted POTW.

No—Facility has not contacted POTW.

If drains discharge directly to surface waters or to underground injection well, does facility have an NPDES or UIC permit?

Yes—Facility has a pipe that goes directly from the facility to a body of water or underground injection well and has an NPDES or UIC permit.

No—Facility has a pipe that goes directly from the facility to a body of water or underground injection

well and does not have an NPDES or UIC permit.

N/A—Facility has no pipes that go directly from the facility to a body of water or underground injection well.

STORM WATER

Does facility store parts, fluids and/or other materials outside?

Yes—Facility stores any materials outside, including drums, trash, tires, parts. This does not include cars to be repaired.

No—Facility stores nothing outside.

Are materials protected from rain/snow in sealed containers or under tarp or roof?

Oil, solvent, and general trash are the major materials that need to be protected

Yes—Items can be protected in any manner in which they will not come in contact with rain or snow, or some other form of water (e.g., washing). Items can be protected by a being stored on pallets, or something else that keeps them off the ground, and covered by a tarp or roof. Dumpsters need to be closed and sealed to the extent that water will not enter or exit them.

No—Items are not considered protected, if they would be exposed to water in the event of rain or snow.

N/A—Facility does not store items outside.

4. AIR POLLUTION CONTROL

PARTS CLEANERS

If facility uses parts cleaning sinks with halogenated solvents, has facility submitted a notification report to EPA?

This question only applies to cleaning sinks that use halogenated solvents. Generally speaking, facilities that use Safety Kleen are not using halogenated solvents because Safety Kleen does not use them for their parts cleaners. However, some facilities use parts cleaners very similar to Safety Kleen parts cleaners that may contain halogenated solvents. Some may even have used Safety Kleen in the past, kept the Safety Kleen parts washer, and added their own solvent. Thus, if a facility has an active contract with Safety Kleen, it is acceptable to assume the solvents are not halogenated. However, if the facility does not have an active contract with Safety Kleen, the assumption can not be made either way.

Halogenated Solvents are solvents containing *greater than 5% concentration* of any of the following:

- | | |
|----------------------|--------------------------|
| – Methylene chloride | – 1,1,1- trichloroethane |
| – Perchloroethylene | – Chloroform |
| – Trichloroethylene | – Carbon tetrachloride |

Methylene chloride, trichloroethylene, and 1,1,1- trichloroethane are the three halogenated solvents most likely to be found in auto repair shop solvents.

It can be determined if these chemicals are contained in the solvent by reading the label on the container or reading a Material Safety Data Sheet (MSDS) that should accompany any hazardous material the facility has onsite.

The notification report is developed by the facility and must contain the following information:

- Name and address of owner or operator;
- Physical location of solvent cleaning machine;

- A statement, signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with the provisions of this 40 CFR Part 63.648; and
- The anticipated compliance approach for each solvent machine.

Yes—Facility has submitted notification form.

No—Facility has not submitted notification form.

N/A—Facility does not use halogenated solvents.

Are sinks kept closed and sealed except when actually cleaning parts?

Yes—Sinks are closed with lid shut except when a technician is actually cleaning the parts.

No—Sinks are observed open where no actual cleaning is being done.

Does facility follow required work and operational practices?

These are only required for facilities that use parts cleaners with halogenated solvents. Required practices are specifically known as Halogenated Solvent Batch Cold Cleaning Machine Standards & Required Worker Practices. The practices are as follows:

- Each owner or operator of a remote-reservoir batch cold solvent cleaning machine shall employ a tightly fitting cover over the solvent sump that shall be closed at all times except during the cleaning of parts.
- All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
- The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
- The owner or operator shall ensure that the solvent level does not exceed the fill line.

- Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers. The container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- When an air or pump agitated solvent bath is used, the owner or operator shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.
- The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
- Sponges, fabric, wood, and paper products shall not be cleaned.
- Each owner or operator of a batch cold cleaning machine shall submit an initial notification report and a compliance report.

Yes—Technicians follow the above practices.

No—Technicians do not follow the above practices.

MOTOR VEHICLE AIR CONDITIONERS

Are MVAC technicians trained and certified by an accredited program?

Technicians that perform a service that may release refrigerant must be trained and certified by an EPA-approved Section 609 program. Certificates are generally found framed on the wall of the shop lobby, or on wallet-sized cards carried by the technicians. Each MVAC technician must have their own certification.

Yes—Technicians are certified.

No—Technicians are unfamiliar with certification.

N/A—Facility does not do work on air conditioners.

If yes, are certificates on file?

Yes—Technicians can show you a certificate on the wall, in a file, or in their wallet.

No—Technicians can not show you a certificate.

Is CFC recovery and/or recycling equipment EPA-approved?

Technicians repairing or servicing MVAC can only use recovery and/or recycling equipment that is approved by EPA. To be approved by EPA, equipment must meet the Society of Automotive Engineers (SAE) standards for approval. Recover-only equipment must meet SAE standard J-2209. Recover/recycle equipment must meet SAE standard J-1991.

Yes—To be EPA approved the equipment must have a label reading one of the following:

- “This equipment has been certified by [approved equipment testing organization] to meet EPA's minimum requirements for recycling or recovery equipment for use with [whatever process the equipment is being used for].”
- “UL approved” or “ARI approved.”

No—Labels are not observed.

N/A—Facility does not use recovery or recycling equipment.

Is equipment recover/recycling or recovery only? (Check one)

Recover/recycling—Equipment recovers CFC's, recycles them, and puts them back into the air conditioner.

Recovery only—Equipment recovers CFC's which must later be returned to an EPA-approved reclaimer.

N/A—Facility does not use recovery and/or recycling equipment on-site.

If recovery only, is refrigerant reclaimed by an EPA-approved reclaimer?

Facilities that use recovery only equipment must provide documentation that refrigerant is sent to an EPA-approved reclaimer.

Yes—Facility can provide documentation that the reclaimer is EPA-approved.

No—Facility can not provide documentation where recovered CFC's are sent.

CATALYTIC CONVERTERS

Does facility replace CC's that are the correct type based on vehicle requirements?

Yes—The facility does either 1 or 2 below.

(1) routinely check a converter catalog or chart to ensure the correct type converter (i.e., oxidation, three-way, or three-way plus air), if an inventory of new converters are kept in stock at the shop or

(2) order converters one at a time as needed from a local parts store and provide the parts store with the vehicle information so that the parts store can send the correct converter for that car.

No—The facility does not do either 1 or 2 listed above.

N/A—The facility is not in the business of replacing catalytic converters. Can skip this section and move on to the Fuels section.

Does facility replace CC's covered under the vehicle manufacturer's warranty?

Installers are prohibited from installing aftermarket catalytic converters on vehicles still covered under the vehicle manufacturer's emission control warranty. The original catalytic converters on 1994 and older vehicles are covered under the manufacturer's warranty for 5 years or 50,000 miles. Models 1995 and newer are covered for 8 years or 80,000 miles.

Yes—The facility does replace converters still under vehicle manufacturer's warranty.

No—The facility only replaces converters not covered by vehicle manufacturer's warranty.

If yes, was original CC missing or due to State/local inspection program requirement?

Yes—The facility installed a converter on a vehicle still covered under manufacturer's warranty that came into the shop with the converter missing or with authorization from the state or local vehicle/

emission inspection program that has determined the existing converter had been lead poisoned, damaged, or otherwise needs replacement. The authorization from the state or local authority should be attached to the work invoice.

No—The facility installed an aftermarket catalytic converter on a vehicle still covered under manufacturer's warranty and the vehicle's original converter was still present and the vehicle owner had no authorization from the state or local vehicle/emission inspection program.

Does facility properly mark and keep replaced CC's onsite for at least 15 days?

Used converters removed from vehicles must be kept on-site, usually in the bay area or outside, for a minimum of 15 days from date removed and must be marked to indicate which customer's vehicle they came from.

Yes—The facility must (1) either write with a marker, chalk, or equivalent, the work invoice number or the date of removal and customer's name on the removed converter and keep onsite for at least 15 days or (2) attach a copy of the work invoice to the removed converter and keep onsite for at least 15 days.

No—The facility does not do 1 or 2 above.

Does facility completely fill out customer paperwork and maintain onsite for at least 6 months?

Customer work invoices for replacement must include the customer's name and complete address and the vehicle's make, model year, and mileage, as well as the reason for replacement. Copies of work invoices, statements and warranties must be retained at the facility for six months.

Yes—To receive a "yes" the facility must do all of the following:

- Completely fill out the work invoice and warranty for the replaced catalytic converter. Work invoices must include the following:
 - Customer's name
 - Customer's complete address
 - Vehicle's make, model year, and mileage
 - Reason for replacement (damaged, clogged, missing...);
- Fill out the catalytic converter manufacturer warranty card completely. Usually the facility will attach a copy of the warranty to the work invoice; and
- Maintain completed work invoices and warranties on-site for at least 6 months.

No—Any of the above are not done.

FUELS

Is Stage I vapor recovery equipment operated properly during unloading of gasoline?

If facility dispenses gasoline and is located within a ozone non-attainment area, Stage I vapor recovery equipment must be used by the gasoline delivery truck driver while filling the facility's gasoline storage tanks. Stage I vapor recovery captures and controls gasoline vapors which would normally be emitted to the atmosphere during the storage of gasoline or during the loading of a gasoline delivery vessel and the subsequent delivery and unloading of a gasoline delivery vessel into a storage tank.

Yes—The facility owner (1) is aware of Stage I requirement and (2) knows for a fact that Stage I equipment is used when gasoline is delivered.

No—The facility owner is not aware of 1 or 2 above.

N/A—Either the facility is not located in a ozone non-attainment area *or* facility does not dispense gasoline.

Is Stage II vapor recovery equipment installed and working at pumps?

If facility dispenses gasoline and is located in a serious-or-above ozone non-attainment area, Stage II vapor recovery equipment should be present and working at each nozzle which dispenses gasoline at the facility. Stage II vapor recovery captures the vapors from the automobile tank and returns them to the storage tank. Stage II vapor recovery can be recognized by the “black boots” on the gasoline nozzles and black hoses extending to the upper fuel pump canopies at dispensing stations.

Yes—The facility owner (1) is aware of Stage II requirement and (2) knows for a fact that Stage II equipment is installed and working.

No—The facility owner is not aware of 1 or 2 above.

N/A—Either the facility is not located in a serious or above ozone non-attainment area *or* facility does not dispense gasoline.

Do fuel delivery records indicate compliance with appropriate fuel requirements?

The facility should maintain fuel delivery tickets (product transfer documents) on-site and periodically review them to determine if your station is receiving the appropriate fuels for your area. These tickets are receipts the facility receives from the fuel deliverer which indicate what type of fuel (gasoline, diesel, kerosene), how much was received, when it was received, and whether the fuel delivered complies with appropriate fuel requirements.

Yes—If the facility is located within a ozone non-attainment area, the fuel delivery ticket should say something like “**RFG, certified for use in an ozone non-attainment covered area**” or “**RFG.**” If the facility is **not** located within an ozone non-attainment area, the fuel delivery ticket should say something like “**Conventional Gasoline, This product does not meet the requirements for reformulated gasoline, and may not be used in any reformulated gasoline covered areas**” or “**conventional**”. If facility also dispenses diesel to on-the- road vehicles, the diesel fuel delivery ticket must say “**Low Sulfur**” or “**Low Sulfur Diesel Fuel.**”

No—If delivery tickets do not indicate proper fuel requirements as described above.

Records not available—The facility does not have any fuel delivery tickets onsite to review.

Are pumps clearly labeled with the product they contain?

Yes—Pumps are labeled to indicate a description of the product (gasoline, diesel, kerosene), product grade (regular, mid-grade, premium...), and octane (86,87,89,91,92,93...) that is being dispensed from that nozzle.

No—Pumps are not sufficiently labeled to indicate what product comes from that nozzle.

Do gasoline pump nozzles comply with 10 gallon per minute flow rate?

After January 1, 1996, every retailer handling over 10,000 gallons of fuel per month shall equip each pump from which gasoline or methanol is introduced into motor vehicles with a nozzle that dispenses fuel at a flow rate not to exceed 10 gallons per minute. After January 1, 1998, this requirement is applied to every retailer.

Yes—The pump nozzles at facility have been tested and comply with 10 gallon per minute flow rate.

No—Pump nozzles have been tested and do not comply.

Don't know—Facility manager is not familiar with requirement or is not sure if pump nozzles have been tested yet.

Is dyed, high-sulfur diesel/kerosene available for sale to motor vehicles?

Motor vehicles in this case include, but not limited to, diesel tractor trailers, diesel pick-up trucks, and diesel automobiles licensed and tagged for on-road travel. **Only low sulfur diesel can be dispensed into motor vehicles used on the road.** High-sulfur diesel dispensing pumps should be locked or in a location which would prohibit on-road vehicle fueling.

Yes—Facility allows high-sulfur diesel fuel to be dispensed into on-road diesel vehicles.

No—Facility does not allow high-sulfur diesel fuel to be dispensed into on-road diesel vehicles by securing the pump nozzle with lock and key and monitoring its use or locating the pump in a place where diesel on-road vehicles can not pull-up and fill-up with high-sulfur diesel.

PAINTS AND THINNERS

Are paints and thinners properly contained and marked when not in use?

Yes—Paints and thinners are stored in containers that are labeled with the contents of the container, are closed with lids tight when not in use, and contained in such a way that a spill would not reach a drain or otherwise leave the facility.

No—Paints and thinners are not stored and labeled as described above.

NA—Facility does not have paints and thinners onsite.

Does facility use low VOC paints?

Paint labels, or product data sheets (or MSDSs) should contain the VOC content of the paint. In general, VOC content greater than or equal to 5 lbs/gallon is high, while low is considered between 4 and 5 and very low is below 4.

Yes—Paints are labeled or MSDS indicates that paint VOC content is less than 5 lbs/gallon.

No—Labeling indicates VOC content is 5 lbs/gallon or higher.

N/A—Facility does not conduct painting. If N/A is circled, skip to Section 4.

Does facility determine whether paints are considered hazardous before disposal?

This is a repeat of question 1 of the checklist, now applied to paints.

Yes—Facility has determined whether paints are hazardous waste before disposing of them. Facility would know this by reading labels to see if there are any hazardous ingredients (identified by warning labels on the paint) or if the paints are considered “flammable.”

No—Facility has not made that determination.

How are used paints, thinners, and solvents disposed?

Reuse—Left over paints and thinners are given away to customers, employees, or at “paint swaps.”

Recycle—Items are recycled by a paint, solvent, or thinner recycler. (Generally this will apply to solvents or thinners).

Mix with other fluids—Materials are mixed with other fluids, such as new solvent or used oil.

Landfill—Materials are disposed at the municipal or a hazardous waste landfill.

Does facility mix paint amounts according to need?

Yes—Facility mixes paint by the job, as opposed to in large batches, thus reducing potential paint waste.

No—Facility mixes paints in large batches.

Does facility use newer, “high transfer efficiency” spray applications?

These are spray painting guns that look very similar to lower efficiency guns. High efficiency sprayers should be labeled HVLP on the gun. This is not yet a federal regulatory requirement (although it is required in some states).

Yes—Facility uses guns that are labeled “HVLP,” or can provide other evidence (e.g., manufacturer information), or tells inspector they know the gun is high efficiency.

No—Guns are not labeled “HVLP,” and facility can not provide evidence that the guns are HVLP.

If hazardous paints are used, are spray paint booth air filters disposed of properly as hazardous waste?

Yes—Hazardous filters are disposed by a hazardous waste hauler and ultimately landfilled or burned in an EPA permitted facility. Facility should have records indicating where hazardous filters are sent and records should include hauler and disposal facility EPA identification numbers.

No—Hazardous filters are disposed with normal trash.

If filters are not hazardous, how are they disposed?

Recycled—Sent to a recycling facility.

Landfilled—Sent to a landfill.

5. UST/SPCC/EMERGENCY SPILL PROCEDURES

Underground Storage Tanks

Has the State UST program been notified of any UST's located on-site?

Yes—The facility has submitted a **NOTIFICATION FORM** to the responsible State UST program office for all on-site UST systems. The Notification Form includes certification of compliance with federal requirements for installation, cathodic protection, release detection, and financial responsibility for UST systems installed after December 22, 1988.

No—The facility has not submitted a Notification Form to the responsible State UST program office.

N/A—Facility has no USTs.

Does facility conduct leak detection for tank and piping of all on-site UST systems?

Yes—Facility conducts at least one of the following leak detection methods (*sources of detailed information on leak detection methods can be found in the NOTE below*):

- All USTs can use **monthly monitoring** consisting of one of the following methods or other methods approved by the regulatory agency.
- USTs installed on or before December 22, 1988 can temporarily use monthly inventory control and annual tank tightness testing. **This is not an acceptable method after December 22, 1998.**

- USTs installed or upgraded with spill, overfill and corrosion protection can use monthly inventory control combined with tank tightness testing every 5 years.
This combined method can be used only until 10 years after the tank has been protected from corrosion or until December 22, 1998, whichever is later.

The following are several approved **monthly monitoring** methods. Check with your state UST program to determine which methods are acceptable in YOUR state.

Automatic tank gauging: This method uses automated processes to monitor product level and inventory control in the tank.

Vapor monitoring: This method samples vapors in the soil surrounding the UST. Leaked petroleum produces vapors that can be detected in the soil gas.

Interstitial monitoring: This method detects leaks between the UST and a second barrier or wall.

Groundwater monitoring: This method monitors the groundwater table near an UST for the presence of released product into the water table.

Statistical inventory reconciliation: A trained professional conducts a statistical analysis of inventory, delivery and dispensing data, which the facility must provide on a regular basis.

Also, any pressurized piping must have: (1) monthly monitoring (as described above) or annual line testing, and (2) an automatic flow restrictor, an automatic shutoff device, or a continuous alarm system installed.

No—Facility does not conduct leak detection.

N/A—Facility has no USTs.

Do USTs at the facility meet requirements for spill, overfill, and corrosion protection?

Yes—Facility either (1) has had devices installed to provide spill, overfill, and corrosion protection or (2) the UST system was constructed with spill, overfill, and corrosion protection. (*Sources of detailed information on spill, overfill, and corrosion protection can be found in the NOTE below.*)

- USTs installed on or before December 22, 1988 must meet these requirements no later than **December 22, 1998**.
- USTs installed after December 22, 1988 must meet these requirements at the time of installation.

No—Facility does not have spill, overfill, and corrosion protection devices installed.

N/A—Facility has no USTs.

Are records and documentation readily available (as applicable) for installation, leak detection, corrosion protection, spill/overfill protection, corrective action, financial responsibility and closure?

Yes—Records and documentation are readily available.

- Leak detection records include past year's monitoring results and most recent tightness test; copies of performance claims; maintenance, repair, and calibration of leak detection equipment.
- Corrosion protection records include results of the last two tests proving the cathodic protection system is working and the last three inspections proving that impressed current systems are operating properly.

- Financial responsibility documentation shows one of the following: you participate in a state financial assurance fund; you have insurance coverage; you have a guarantee from another firm; you have a surety bond; you have a letter of credit; you have passed a financial test; you have set up a trust fund; or you use another financial method(s) of coverage approved by your state.
- Closure records document that the UST was removed from service in accordance with federal requirements for notification and correct, safe closure.
- Corrective action records document that any releases from USTs have been reported to the appropriate agency and have been responded to as required.

No—Records are not readily available and the facility does not know where they are.

N/A—Facility has no USTs.

NOTE: To find out more about federal UST requirements, you can receive free explanatory publications and assistance by calling EPA's UST Hotline at 1-800-424-9346 or by visiting the EPA's Office of Underground Storage Tanks web site at <http://www.epa.gov/oust/>. State and local UST requirements can differ from federal requirements, so be sure to check with appropriate State and local regulatory agencies.

SPILL PREVENTION COUNTERMEASURES CONTROL (SPCC) AND EMERGENCY RESPONSE

Does facility have a gasoline, fuel oil, or lubricating oil storage capacity total greater than 1,320 gallons (or greater than 660 gallons in any one tank) in aboveground tanks or total underground tank storage capacity greater than 42,000 gallons?

Note the limits are different for above and below ground tanks. When adding the totals note that capacity:

- Includes amount of oil that could be contained. e.g., one 500-gallon tank with 350 gallons of oil would still count as 500 gallons toward the total.
- Includes oil stored in drums, buckets, etc. e.g., one 600-gallon AST + one 500-gallon AST + five 55-gallon drums = 1,375 gallons total.

Yes—Facility exceeds capacity limits indicated above.

No—Facility storage capacity is less than limits above.

If yes, could spilled gasoline fuel oil or lubricating oil conceivably reach navigable waters?

Navigable waters—This means *any* body of water. The word *eventually* is key here. If spill could get to ground water, storm water, a creek, etc., it is considered to be able to “eventually” reach navigable waters. Spills are considered to be able to eventually reach navigable waters even if man made structures (e.g., dikes, berms, storage containers) are present.

Yes—A spill could conceivably reach navigable waters

No—A spill could not conceivably reach navigable waters

If yes, does the facility have a SPCC plan signed by a Professional Engineer?

Yes—The facility has a plan called “Spill Prevention Control and Countermeasures Plan” (SPCC) that has been signed and sealed by a professional engineer. This is not the same as a “hazardous materials plan,” or an “emergency response plan.” However, some facilities may combine the SPCC plan with another plan. If this is done the plan should include wording such as “spill control and emergency response plan.” If it the words are close, and the plan is signed by a P.E., check “yes.”

No—The facility does not have a plan or plan is not signed by a P.E.

Are phone numbers of the National, State and local emergency contacts available onsite for immediate reporting of oil or chemical spills?

The accidental release of a hazardous substance or an oil spill that meets federal reporting requirements (a discharge of oil that causes a discoloration or “sheen” on the surface of water, violates water quality standards, or causes a sludge or emulsion to be deposited beneath the surface or on adjoining shorelines) must be reported to the National Response Center (NRC) at 1-800-424-8802.

Yes—Phone numbers are available.

No—Phone numbers are not available.